

# **EXHIBIT 23**

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION

EDEN ROGERS and

BRANDY WELCH,

Plaintiffs,

vs.

CASE NO. 6:19-cv-01567-TMC

UNITED STATES DEPARTMENT OF HEALTH  
AND HUMAN SERVICES;  
ALEX AZAR, in his official capacity as SECRETARY of  
the UNITED STATES DEPARTMENT OF  
HEALTH AND HUMAN SERVICES;  
ADMINISTRATION FOR CHILDREN AND FAMILIES;  
LYNN JOHNSON, in her official capacity as ASSISTANT  
SECRETARY of the ADMINISTRATION FOR CHILDREN AND  
FAMILIES;  
SCOTT LEKAN, in his official capacity as PRINCIPAL  
DEPUTY ASSISTANT SECRETARY of the ADMINISTRATION  
FOR CHILDREN AND FAMILIES;  
HENRY MCMASTER, in his official capacity as  
GOVERNOR of the STATE OF SOUTH CAROLINA;  
  
MICHAEL LEACH, in his official capacity as STATE  
DIRECTOR of the SOUTH CAROLINA DEPARTMENT OF SOCIAL  
SERVICES,

Defendants.

VIDEOTAPED

DEPOSITION OF: LAUREN COLLINS STAUDT  
(APPEARING VIA VIRTUAL ZOOM)

DATE: June 4, 2021

TIME: 9:05 AM

REPORTED BY: TERRI L. BRUSSEAU  
(APPEARING VIA VIRTUAL ZOOM)

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1 ALSO PRESENT:

2 George Libbares, Concierge Technician  
3 (Appearing Via Virtual Zoom)

4 Darin Weaver, Video Technician  
5 (Appearing Via Virtual Zoom)

6 (INDEX AT REAR OF TRANSCRIPT)  
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1 COURT REPORTER: I'll take care of  
2 that.

3 MR. COLEMAN: Thank you.

4 MS. JANSON: Okay. That should be  
5 loading now.

6 BY MS. SCHINDEL:

7 Q. So this is -- for the record, this is  
8 Exhibit 17. It is Bates stamped Miracle\_Hill\_  
9 Subp\_008026 to 028.

10 And this is a letter from DSS to  
11 Senators Shealy, Young, Climer and Turner dated  
12 February 28, 2018. Have you seen this document  
13 before?

14 A. Really, I don't have it -- doesn't look  
15 familiar to me.

16 Q. Okay. Well, we'll just spend a few  
17 minutes with it. Do you agree that this document  
18 is a letter from DSS to -- to the senators that I  
19 listed out before?

20 A. Yes.

21 Q. Do you agree that in the second  
22 paragraph, it says -- it says: Last year the  
23 Department and MHM -- would you agree that MHM is a  
24 reference to Miracle Hill --

25 A. Yes.

1 Q. -- began having conversations regarding  
2 MS -- MHM's practice of refusing services to foster  
3 and adoptive families who are not Protestant  
4 Catholic -- excuse me, Protestant Christian, e.g.,  
5 Catholic, Episcopalian, Jewish, etc., in light of  
6 federal regulations.

7 And then the paragraph below that says:  
8 In response to your request letter dated February  
9 21st, 2018, please find responsive documents  
10 attached and more fully described below.

11 And then there's an italics below that  
12 that says: That DSS provide us with documentary  
13 evidence to substantiate its position that Miracle  
14 Hill may be unlawfully discriminating on the basis  
15 of religion potentially in violation of various  
16 South Carolina Code of Regulations?

17 A. Yes.

18 Q. And federal regulations. And then you  
19 see below that that there are attachments listed  
20 out, Attachments 1 through 10?

21 A. Yes.

22 Q. And do you see that attachment one  
23 says: Excerpt from MHM 2017 licensing renewal  
24 submission containing MHM's description of its  
25 foster home program -- program describing

1 qualifications, including the requirements that a  
2 foster parent must, quote, one, be a born-again  
3 believer in the Lord Jesus Christ as expressed by a  
4 personal testimony and Christian conduct; two, be  
5 in agreement without reservation with the doctrinal  
6 statement of Miracle Hill Ministries; three, be an  
7 active participant in --

8 COURT REPORTER: Rebecca. Rebecca,  
9 you're -- Rebecca, you're going to have to slow  
10 down for me. Start with number two.

11 MS. SCHINDEL: Two, be in agreement  
12 without reservation with the doctrinal statement of  
13 Miracle Hill Ministries; three, be an active  
14 participant and in good standing with a Protestant  
15 church, close quote, et cetera.

16 Do you see that?

17 A. Yes.

18 Q. And do you -- it says that an excerpt  
19 from Miracle Hill's licensing renewal submission,  
20 right?

21 A. Yes.

22 Q. And those are materials that you would  
23 have received and reviewed?

24 A. I may not have -- I may not have  
25 reviewed it, but, yes, it would have gone with the



1 packet that came through.

2 Q. So then if we could tab -- excuse me,  
3 mark Tab 45.

4 (EXHIBIT 18, Document entitled  
5 Attachment 1 (Miracle Hill Foster Home Program),  
6 MIRACLE\_HILL\_SUBP\_007963 to 008025, was marked for  
7 identification.)

8 MS. JANSON: That should be coming up  
9 now.

10 MS. SCHINDEL: Okay.

11 MR. RIDDLE: Still loading.

12 BY MS. SCHINDEL:

13 Q. This is -- I'll just read into the  
14 record while it's loading if that's all right.  
15 This is Exhibit 18 Bates stamped  
16 Miracle\_Hill\_Subp\_007963 to 8025. And if you'd  
17 just let me know when it -- when it loads for you.

18 A. Wait one second.

19 Q. Sure.

20 MR. RIDDLE: There you go.

21 THE WITNESS: All right.

22 BY MS. SCHINDEL:

23 Q. All right. So if you are able to  
24 scroll through, I think you'll find this is a  
25 series -- a PDF with ten different attachments in

1 it.

2 A. Um-hum.

3 Q. Does that look right to you?

4 A. Yes.

5 Q. And if you were to compare -- I know  
6 it's hard to look at two exhibits at once, but I'll  
7 submit to you that these attachments line up with  
8 the attachments referenced in that letter on Tab  
9 44.

10 If you look at Tab -- Attachment 1,  
11 which is what we were just reading from a moment  
12 ago and then the letter, and do you recall that  
13 that was the excerpt from Miracle Hill's foster  
14 care program?

15 A. Yeah.

16 Q. And that was submitted in the -- with  
17 the 2017 licensing renewal based on that letter.  
18 And if you look at the second paragraph here, it  
19 says -- have you -- have you seen this document  
20 before?

21 A. I'm sure I have, yeah.

22 Q. And the second paragraph says: A  
23 foster parent for Miracle Hill must, and then it  
24 repeats the things that we just read a moment ago  
25 into the record, be a born-again believer in the

1 Lord Jesus Christ as expressed by a personal  
2 testimony of Christian conduct, et cetera.

3 Do you agree that this aligns with the  
4 excerpt we just read a moment ago?

5 A. Yes.

6 Q. And then do you see Number 5 in this  
7 list of what a foster parent for Miracle Hill must  
8 be?

9 A. Yes.

10 Q. And it says: Have a lifestyle that is  
11 free of sexual sin, to include pornographic  
12 material, homosexuality and extramarital  
13 relationship. Right?

14 A. Yes.

15 Q. So -- and this would have been the 2017  
16 submission to DSS, is that right?

17 A. I mean, you -- you told me that. I  
18 don't -- I guess. I don't know how I --

19 Q. Do you agree that the letter that DSS  
20 sent to the senators states that this is in the  
21 2017 licensing renewal packet?

22 A. Yes, correct.

23 Q. So do you agree that this document from  
24 Miracle Hill suggests that it will -- that a foster  
25 parent from Miracle Hill cannot be in a same sex

1 relationship?

2 A. That's what this says, yes.

3 Q. So do you agree that Miracle Hill was  
4 discriminating on the basis of sexual orientation?

5 A. It's possible, yes.

6 Q. Do you interpret that differently?

7 A. I -- just one of their beliefs that  
8 they have got down here.

9 Q. So do you agree that DSS was providing  
10 this information that Miracle Hill was  
11 discriminating on the basis of sexual orientation  
12 in 20 -- before 2018?

13 A. Yes.

14 Q. Okay. Earlier you had identified Oasis  
15 of Hope as one of the CPAs that was licensed last  
16 year, is that right?

17 A. Yes.

18 Q. What were the other three CPAs?

19 A. Mindful Missions, Innovative Solutions,  
20 and we are just licensing an adoption agency called  
21 Abiding Love.

22 Q. And is it accurate -- oh, I'm sorry.

23 A. The adoption agency does not do -- will  
24 not do foster care licensing.

25 Q. I see. So there are -- there are three